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December 20, 2024

VIA ECF

The Honorable Arun Subramanian **United States District Court** Southern District of New York 500 Pearl Street, Room 520 New York, NY 10007

> RE: United States of America v. Robert Piaro (Case No.: 23 CR 420 (AS))

Dear Judge Subramanian:

The parties, by undersigned counsel, respectfully submit this joint letter requesting that the pretrial hearing scheduled for January 6, 2025 at 1:00 P.M. be adjourned for two weeks to a time on January 21, 2025, or as otherwise meets this Honorable Court's convenience. The reason for this request is that the parties continue to confer, diligently discussing potential pretrial resolutions and there are no issues presently to raise before the Court. Moreover, time has already been excluded under The Speedy Trial Act until March 17, 2025.

GRANTED. The pretrial conference is now scheduled for Friday, January 24, 2025 at 2:00 PM. If that date or time doesn't work for the parties, they should propose new dates or times by December 30, 2024. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 53.

SO ORDERED.

Arun Subramanian, U.S.D.J.

Date: December 20, 2024

Respectfully submitted,

/s/ Toby K. Henderson

Bryan K. Penick (Ohio Bar #0071489) Toby K. Henderson (Ohio Bar #0071378) Brian A. Muenchenbach (Ohio Bar #0088722)

(Admitted *Pro Hac Vice*)

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c: All Counsel of record (via ECF)